UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

) HEANNE DECAN	CIVIL ACTION NO. 04CV11024 RWZ
JEANNE DEGAN,	Wind the class of the control of the
)	Jonathan R. Sigel
Plaintiff,)	BBO# 559850
v.)	
)	
GOLDWELL OF NEW ENGLAND,)	
INC. and R.G. SHAKOUR, INC.	
)	
Defendants.	

ASSENTED TO MOTION TO EXTEND TIME TO FILE DISPOSITIVE MOTION

Pursuant to Rule 7.1(b)(2) of the Local Rules of the United States District Court for the District of Massachusetts, Defendants Goldwell of New England, Inc. and R.G. Shakour, Inc. respectfully request a five (5) business day extension of time (to July 8, 2005) within which to file their dispositive Motion for Summary Judgment. As grounds for their *assented to* motion, Defendants state as follows:

- 1. At a Status Conference held on April 12, 2005, the Court ordered Defendants to file their dispositive motion (i.e., Motion for Summary Judgment) on or before June 30, 2005.
- 2. Following the Status Conference, Defendants' counsel litigated a jury trial in the United States District Court for the District of Massachusetts. Due to a hung jury on a portion of that case, a re-trial was scheduled to begin on June 27, 2005.
- 3. Due to this trial scheduling and ensuing preparation for trial, counsel requires a brief extension of time to prepare and file Defendants' Motion for Summary Judgment.
 - 4. Counsel for Plaintiff has assented to this motion.

WHEREFORE, Defendants Goldwell of New England, Inc. and R.G. Shakour, Inc. respectfully request the Court to extend the time for filing their Motion for Summary Judgment to July 8, 2005.

GOLDWELL OF NEW ENGLAND, INC. and R.G. SHAKOUR, INC.

By their attorneys,

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ASSENTED TO:

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Dated: June 27, 2005